

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	x	
In re MERIDIAN FUNDS GROUP	:	No. 09-md-2082
SECURITIES & EMPLOYEE RETIREMENT	:	
INCOME SECURITY ACT (ERISA)	:	DECLARATION OF SHARON GOODMAN
LITIGATION	:	FILED ON BEHALF OF SLEVIN & HART,
	:	P.C. IN SUPPORT OF APPLICATION FOR
	x	AWARD OF ATTORNEYS' FEES AND
		EXPENSES

I, Sharon Goodman, declare as follows:

1. I am a Principal with the firm of Slevin & Hart, P.C. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-entitled action.

2. This firm is additional counsel of record to Lead Plaintiff Pension Trust Fund for Operating Engineers.

3. The information in this declaration regarding the firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. I am the Principal who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. As a result of this review and the adjustments made, I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the reductions referred to above, the number of hours spent on this litigation by my firm is 510.30. A breakdown of the lodestar is provided in **Exhibit A**. The lodestar amount for attorney/paralegal time based on the firm's current rates is \$189,460.50. The hourly rates shown in **Exhibit A** are the usual and customary rates set by the firm for each individual.

5. My firm seeks an award of \$4,785.68 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in **Exhibit B**.

6. The following is additional information regarding certain of these expenses:

(a) Filing and Other Fees: \$7.00. These expenses have been paid to the Maryland Court of Appeals to obtain copies of court documents for plaintiffs.

(b) Transportation, Hotels & Meals: \$735.15. In connection with the prosecution of this case, the firm has paid for travel expenses to attend hearings. The date, destination and purpose of each trip is set forth in **Exhibit C**.

(c) Photocopies: \$76.95. In connection with this case, the firm made 513 in-house copies, charging \$0.15 per copy for a total of \$76.95. Each time an in-house copy machine is used, our billing system requires that a case or administrative billing code be entered and that is how the 513 copies were identified as related to this case.

(d) Online Legal and Financial Research: \$3,915.25. These included vendors such as Lexis-Nexis, PACER, and the Delaware Department of State Division of Corporations. These databases were used to obtain access to corporate filings, online dockets and legal research. This expense represents the expense incurred by Slevin & Hart, P.C. for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested.

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

8. The identification and background of my firm and its principals is attached hereto as **Exhibit D**.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of July 2016, in Washington, D.C.



SHARON GOODMAN

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CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2016, I caused the foregoing Declaration of Sharon Goodman Filed on Behalf of Slevin & Hart, P.C. in Support of Application for Award of Attorneys' Fees and Expenses to be served electronically on all ECF participants.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART